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**Hearing: May 31, 2017 at 10 a.m.**

*Attorneys for Defendant*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff,

Adv. Pro. No. 10-04728 (SMB)

Plaintiff,

v.

BRUNO L. DI GIULIAN,

Defendant.

**DECLARATION OF HELEN DAVIS CHAITMAN**

I, Helen Davis Chaitman, hereby declare, as follows:

1. I am a partner with Chaitman LLP, counsel to Defendant, ("Defendant"). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in opposition to Trustee's Motion for Substitution of Defendant and in support of Defendant's Cross-Motion to Dismiss Complaint.

3. Attached hereto as **Exhibit A** is a true and accurate copy of emails dated January 13, 2016.

4. I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct.

Dated: New York, New York  
May 23, 2017

/s/ Helen Davis Chaitman  
Helen Davis Chaitman